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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 AMMANDA SOLIZ,

Case No.: 3:21-cv-00459-RCJ-WGC

15 Plaintiff,

16 vs.

17 **STIPULATED DISCOVERY PLAN AND**
18 **SCHEDULING ORDER**
19 **SUBMITTED IN COMPLIANCE**
20 **WITH LR 26-1(b)**

21 ELITE SPICES, INC.,

22 Defendant.

23 Pursuant to Fed. R. Civ. P. 26 and LR 26-1, Plaintiff AMMANDA SOLIZ, and Defendant
24 ELITE SPICES, INC., by and through their attorneys of record, herewith submit their Stipulated
25 Discovery Plan and Scheduling Order. The parties are requesting a 180-day discovery plan.

26 1. **Initial Disclosures**: Pursuant to Fed. R. Civ. P. 26(f)(1), the parties, by and
27 through their respective counsel, conferenced telephonically on January 3, 2022. Pursuant to Fed.
28 R. Civ. P. 26(a)(1), the parties will exchange initial disclosures on or before January 17, 2022.

3. **Discovery Plan**: The parties agree that the subjects of discovery should include,
but not be limited to, all claims and defenses allowed pursuant to the Federal Rules of Civil
Procedure. The parties have identified (1) no needed changes to the timing, form or requirement
for disclosures; (2) no issues about (a) disclosure, discovery, or preservation of electronically
stored information or (b) claims of privilege or of protection; and (3) no needed changes in the

1 limitations on discovery imposed under the federal rules of civil procedure or the local rules and
 2 no need to conduct discovery in phases. Although the parties are working together on a proposed
 3 protective order, the parties do not propose that the Court should issue any orders under Rule 26(c)
 4 or Rule 16(b) or (c) at this time.

5 **3. Discovery Cut-Off Date(s):** Plaintiff filed their Complaint and Jury Demand on
 6 October 26, 2021. Defendant filed its Answer to the Complaint and Jury Demand on November
 7 19, 2021. The last day of discovery shall therefore be **May 18, 2022**, 180 days from when the
 8 defendant answered.

9 **4. Amending the Pleadings and Adding Parties:** The parties shall have until
 10 **February 17, 2022**, ninety (90) days before the discovery cut-off date, to file any motions to
 11 amend the pleadings or to add parties.

12 **5. Expert Disclosures:** Initial expert disclosures related to the claims for relief in the
 13 original Complaint and third-party discovery are due **March 18, 2022**, approximately sixty (60)
 14 before the discovery cut-off date (exactly sixty days lands on a Saturday). Rebuttal expert
 15 disclosures are due on **April 18, 2022** (exactly thirty days lands on a Sunday). Expert deposition
 16 must be completed within thirty days of the last expert disclosure.

17 **6. Dispositive Motions:** The parties shall have until **June 17, 2022**, thirty (30) days
 18 after the discovery cut-off to file dispositive motion(s).

19 **7. Pretrial Order:** The pretrial order shall be filed on **July 17, 2022**, approximately
 20 thirty (30) days after the date set for filing dispositive motions in the case (exactly thirty days lands
 21 on a Sunday). In the event a dispositive motion is filed, the date for the filing pretrial order shall
 22 be suspended until thirty (30) days after the decision of the dispositive motions or further order of
 23 the Court.

24 **8. Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P.
 25 26(a)(3), and any objections thereto, shall be included in the pretrial order.

26 **9. Alternative Dispute Resolution:** In compliance with LR 26-1(b)(7), the parties
 27 certify that they met and conferred about the possibility of using alternative dispute resolution
 28

processes, but no agreement has been reached. Nonetheless, the parties intend to participate in the early neutral evaluation currently scheduled for February 10, 2022 in good faith. The parties will continue to evaluate opportunities for alternative dispute resolution.

10. Alternative Forms of Case Disposition: The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01). The parties are not amenable to have the United States Magistrate Judge preside over all aspects of this case, and the parties believe this case should proceed on the normal litigation track.

11. Electronic Evidence: The parties certify that they have discussed but have not made any plans or reached any stipulations about providing discovery or presenting evidence to jurors in electronic format.

Respectfully submitted this 3rd day of January, 2022.

MARK MAUSER LAW OFFICE

JACKSON LEWIS P.C.

By: /s/ Mark Mausert

By: /s/ Hilary Williams

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IT IS SO ORDERED:

William G. Cobb
UNITED STATES MAGISTRATE JUDGE

DATED: January 4, 2022